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Attorney for Diane Marie Aldrich

E-FILED: April 1, 2010

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:) Case No. BKS-09-25950-LBR
) Chapter 13
)
) Hearing Date: N/A
Diane Marie Aldrich,) Hearing Time: N/A
)
)
Debtor(s).)
)
)

MOTION TO EMPLOY HAINES & KRIEGER LOAN MODIFICATIONS, LLC
AND TO APPROVE ADMINISTRATIVE EXPENSES FOR LOAN
MODIFICATION SERVICES

COMES NOW, Haines & Krieger Loan Modifications, LLC through the law firm of Haines & Krieger, L.L.C. on behalf of the Debtor and hereby requests this Court to approve Haines & Krieger Loan Modifications, LLC to act as a Loan Modification "Covered Service Provider" pursuant to Nevada Revised Statutes 645F (as revised August 25, 2009) for the purpose of assisting the Debtor and the Chapter 13 estate obtain a loan modification of the Debtor's primary residence.

Debtor filed the instant Chapter 13, Case Number 09-25950 on August 27, 2009.

The Debtor has contracted with Haines & Krieger Loan Modifications, LLC for the purpose of obtaining a loan modification to assist with making the Debtor's mortgage payments affordable for the Debtor's primary residence.

The Court may allow the appointment and employment of professionals as needed. For disclosure purposes, Haines and Krieger Loan Modifications, LLC is wholly owned by George Haines, Esq. (50%) and David Krieger, Esq. (50%) who are also the sole equity holders of Haines & Krieger, LLC, the Debtor's counsel in this Chapter 13

matter and the Debtor has been provided. Debtor has been advised of this in writing and still desires to have the Court permit the employment of HKLM

The total cost to the Debtor for Haines & Krieger Loan Modifications, LLC's loan modification representation is \$3,500. Any unearned fees shall be turned over to the Chapter 13 Trustee (or the Debtor in the event the instant case is no longer active).

As the Debtor has chosen to hire Haines & Krieger Loan Modifications, LLC to provide loan modification services, it is therefore requested that the Court approve the instant application and direct the Chapter 13 Trustee to disburse funds to Haines & Krieger Loan Modifications, LLC in the amount of \$3,500.

WHEREFORE the Debtor requests:

1. The Court approve the employment of Haines & Krieger Loan Modifications, LLC to be paid as an administrative expense;
2. The Court permit the Chapter 13 Trustee to immediately begin disbursements from funds received from the Debtor to Haines & Krieger Loan Modifications, LLC's in the amount of \$3,500 to be paid by funds paid by the Debtor to the Chapter 13 Trustee; and
3. That the Chapter 13 Trustee shall be immediately entitled to administrative fees pursuant to 11 U.S.C. Section 503(b) for funds disbursed.

Dated: April 1, 2010

/s/David Krieger, Esq.
David Krieger, Esq.
Nevada Bar No. 9086
Attorney for Debtor(s)

EXHIBIT: FORM OF ORDER

David Krieger, Esq.
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George Haines, Esq.
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**ORDER ON MOTION TO EMPLOY HAINES & KRIEGER LOAN
MODIFICATIONS, LLC AND TO APPROVE ADMINISTRATIVE EXPENSES
FOR LOAN MODIFICATION SERVICES**

THE ABOVE Motion having been filed and timely notice provided to all
interested parties pursuant to LR 9014.1 (negative notice procedures):

IT IS ORDERED THAT the Court hereby approves the employment of Haines
& Krieger Loan Modifications, LLC to be paid as an administrative expense;

IT IS FURTHER ORDERED THAT the Chapter 13 Trustee shall immediately begin disbursements from funds paid by the Debtor to Haines & Krieger Loan Modifications, LLC's in the amount of \$3,500;

IT IS FURTHER ORDERED THAT the Chapter 13 Trustee shall be entitled to administrative fees pursuant to 11 U.S.C. Section 503(b) for funds disbursed pursuant to this Order;

DATED April 1, 2010.

HAINES & KRIEGER, L.L.C.

By: /s/David Krieger, Esq.
David Krieger, Esq.
Nevada Bar No. 9086
Attorney for Debtor(s)

ALTERNATIVE METHOD re: RULE 9021:

In accordance with LR 9021, counsel submitting this document certifies as follows (check one):

☐ The court has waived the requirement of approval under LR 9021.

☐ This is a Chapter 7 or 13 case, and either with the motion, or at the hearing, I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

APPROVED:

DISAPPROVED:

FAILED TO RESPOND:

☐ I certify that I have served a copy of this order with the motion, and no parties appeared or filed written objections.

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